

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BARRY HONIG , an individual,)	
)	
Plaintiff,)	
)	
v.)	
)	CASE NO. 16-cv-02432 LMM
)	
Christopher Drose, “Bleecker Street)	
Research” and DOES 1-10)	
Defendants)	
)	
)	

DEFENDANTS’ MOTION FOR LEAVE TO AMEND ANSWER

Defendant Christopher Drose (“Defendant Drose”) hereby moves pursuant to Fed. R. Civ. P. 15 (a) (2) for leave to amend his answer to plaintiff’s complaint to add an affirmative defense under Georgia’s anti-SLAPP law (O.C.G.A. §51-5-7(4) and §9-11-11.1) and a related defense of failure to state a claim upon which relief may be granted. A Memorandum of Law Supporting Defendant’s Motion for Leave to Amend Answer accompanies this Motion and a proposed Amended Answer accompanies this Motion as Exhibit A.

Dated: August 25, 2016.

s/ Jerry L. Sims

Jerry L. Sims, GA Bar No. 648400

DAVIS GILLET MOTTERN & SIMS, LLC

Promenade, Suite 2445

1230 Peachtree Street, NE

Atlanta, Georgia 30309

Direct: (770) 481-7207

Cell: (770) 335-4140

Fax: (404) 521-4995

Email: jlsims@ilglaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Defendant's Motion for Leave to Amend Answer has been electronically filed with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to the attorneys of record for Plaintiffs, as follows:

Christopher Campbell
DLA PIPER LLP (US)
One Atlantic Center
1201 West Peachtree Street, Suite 2800
Atlanta, Georgia 30309-3450

Perrie M. Weiner
Robert D. Weber
DLA PIPER LLP (US)
2000 Avenue of the Stars
Suite 400 North Tower
Los Angeles, CA 90067-4704

Charles J. Harder
HARDER MIRELL & ABRAMS LLP
132 S. Rodeo Dr. Suite 301
Beverly Hills, CA 90212

This 25th day of August, 2016.

s/Jerry L. Sims
Jerry L. Sims GA Bar No. 648400
Attorney for Plaintiff